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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER SETTING BRIEFING SCHEDULE
ON META'S MOTION FOR A
PROTECTIVE ORDER IN CONNECTION
WITH THE DEPOSITION OF JASON
SATTIZAHN**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel, the MDL Personal Injury and School District (“PI/SD”) Plaintiffs, the JCCP Personal Injury Plaintiffs (“JCCP Plaintiffs”), and the MDL State Attorneys General (“State AGs”) (collectively, “Plaintiffs”); the Meta Defendants (“Meta”); and third-party Jason Sattizahn (together with Plaintiffs and Meta, the “Parties”) hereby agree to the following negotiated letter-briefing schedule on Meta’s forthcoming Motion for a Protective Order in connection with the deposition of Mr. Sattizahn.

WHEREAS, Meta previously moved to strike Mr. Sattizahn from Plaintiffs’ preliminary witness lists. ECF 2315.

WHEREAS, the Court denied Meta’s motion but granted leave for Meta to take Mr. Sattizahn’s deposition, by no later than December 11, 2025. ECF 2348.

WHEREAS, Mr. Sattizahn’s deposition is scheduled to take place on December 8, 2025.

WHEREAS, Meta intends to seek a protective order prohibiting Plaintiffs from inquiring into—and Mr. Sattizahn from testifying about—Meta’s attorney-client privileged communications, including the privileged portions of the four documents that were the subject of the D.C. court order that MDL Plaintiffs recently brought to the Court’s attention (the “Four Documents”), *see* ECF 2332-1, which order has been stayed pending Meta’s motion for reconsideration, *see* ECF 2345-1.

WHEREAS, the Parties have agreed to brief Meta’s motion for a protective order in two installments, with the first letter-brief due Monday, November 17, 2025, and the second letter-brief due Thursday, November 20, 2025. The first letter-brief will address Meta’s motion for a protective order prohibiting Plaintiffs from inquiring into—and Mr. Sattizahn from testifying about—Meta’s attorney-client privileged communications. The second letter-brief will focus on the aspect of that protective order pertaining to the Four Documents, which Meta will submit for *in camera* review in connection with the second letter-brief, along with three privileged declarations supporting Meta’s claim of privilege.

WHEREAS, Meta respectfully requests that the Court issue a ruling on the letter-briefs in advance of Mr. Sattizahn’s deposition on December 8. To the extent the Court wishes to hear argument,

Meta respectfully requests that a hearing be scheduled for the week of December 1-5, either virtually or in-person. Meta requests an accelerated ruling given the timing of Mr. Sattizahn's deposition and also because Judge Kuhl has stated her desire to "defer to the federal court" on the Four Documents, but only if the Court's ruling can be made promptly given the January 27, 2026 trial date in the JCCP. *See* 10/28/25 JCCP Hr'g Tr. at 8:13-16, 9:1-2.¹ In case it cannot, Judge Kuhl has ordered JCCP Plaintiffs to file a placeholder Motion to Compel the Four Documents in the JCCP (without a hearing date), which they filed on November 7, 2025; there is currently no briefing schedule set for the Motion.

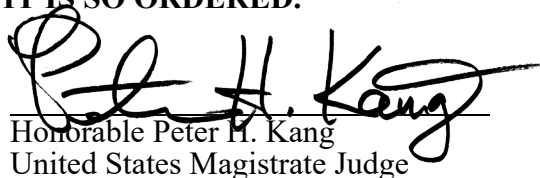
WHEREAS, the JCCP Plaintiffs intend to attach their JCCP Motion to Compel to the Parties' second letter-brief (due November 18) for the sake of the record. However, the Parties agree that the JCCP Motion may not be incorporated by reference into the letter-brief.

WHEREAS, Plaintiffs oppose Meta's request to have a hearing scheduled before Mr. Sattizahn's deposition during the week of December 1-5 as premature and unnecessary. The status of these documents is pending in ongoing proceedings in the District of Columbia, and the Four Documents at issue bear no relationship to Mr. Sattizahn, nor will they be used at his deposition.

IT IS SO STIPULATED, through Counsel of Record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 14, 2025


Honorable Peter H. Kang
United States Magistrate Judge

¹ Meta will defer to the MDL Court's ruling on the Four Documents for purposes of the JCCP, understanding that, depending on that ruling, MDL Plaintiffs and JCCP Plaintiffs may separately wish to seek further relief from Judge Gonzalez Rogers and Judge Kuhl, respectively.

Respectfully submitted,

DATED: November 14, 2025

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 14, 2025

By: /s/ Ashley M. Simonsen